

DAYLE ELIESON
United States Attorney
District of Nevada
TINA NAICKER, CSBN 252766
Special Assistant United States Attorney
160 Spear Street, Suite 800
San Francisco, California 94105
Telephone: (415) 268-5611
Facsimile: (415) 744-0134
E-Mail: Tina.Naicker@SSA.gov

Attorneys for Defendant

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

JENAIL H. NEWTON,
Plaintiff,

v.

NANCY A. BERRYHILL,
Acting Commissioner of Social Security,
Defendant.

Case No. 2:18-cv-00971-GMN-GWF

**JOINT STIPULATION AND ~~PROPOSED~~
ORDER FOR EXTENSION OF TIME TO
RESPOND TO PLAINTIFF'S MOTION FOR
REVERSAL/REMAND.**

IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that the time for Defendant to file her response to Plaintiff's Motion for Reversal/Remand be extended from January 18, 2019 to **March 1, 2019**. This is Defendant's first request for extension. Good cause exists to grant Defendant's request for extension. Counsel currently has a Ninth Circuit brief due next week, which requires multiple levels of review. Due to scheduling conflicts from the government shutdown, Counsel for Defendant needs additional time to make time for U.S. Attorney review. In addition, Counsel has over 80+ active social security matters that require two or more dispositive motions per week. For example, at this time, Counsel for Defendant has three other dispositive

1 motions due on the same date as the current filing deadline for this case. As such, Counsel
2 respectfully requests additional time to adequately review the transcript and respond to the issues
3 raised in Plaintiff's Motion. Defendant makes this request in good faith with no intention to unduly
4 delay the proceedings. Defendant apologizes for the belated request for extension, but had ongoing
5 health and personal family issues following the Christmas holiday. Counsel sought and filed an
6 extension of time as soon as reasonably practicable. The parties further stipulate that the Court's
7 Scheduling Order shall be modified accordingly.
8

9 Respectfully submitted,

10 Dated: January 18, 2019

/s/ Joshua Harris
(*as authorized by email on January 18, 2019)
JOSHUA HARRIS
Attorney for Plaintiff

14 Dated: January 18, 2019

DAYLE ELIESON
United States Attorney
DEBORAH LEE STACHEL
Regional Chief Counsel, Region IX
Social Security Administration

18 By /s/ Tina L. Naicker
19 TINA L. NAICKER
20 Special Assistant U.S. Attorney
Attorneys for Defendant

21 **ORDER**

22 APPROVED AND SO ORDERED:

24 DATED: 01-22-2019


THE HONORABLE GEORGE W. FOLEY, JR.
UNITED STATES MAGISTRATE JUDGE